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October 21, 2020

VIA ECF

The Honorable John G. Koeltl
United States District Judge for the
Southern District of New York
500 Pearl Street
New York, NY 10006

Re: PDV USA, Inc. v. Interamerican Consulting Inc., No: 1:20-cv-03699-JGK

Dear Judge Koeltl:

This firm represents Plaintiff PDV USA, Inc. (“PDV USA”), in the above-referenced matter. In accordance with Rule I.E. of Your Honor’s Individual Practices, we submit this letter motion, unopposed and on consent of Defendant’s counsel with whom we met and conferred, to respectfully request the extension of Plaintiff’s deadline to file an amended complaint as well as related deadlines in connection with Defendants’ anticipated motion to dismiss.

Specifically, on October 8, 2020, Your Honor issued a scheduling order directing Plaintiff to file an amended complaint by October 23, 2020, and providing defendant until November 20, 2020 to move or answer the amended complaint. If the defendant moves, as expected, then Plaintiff currently has until December 18, 2020, to file its opposition papers, and Defendant has until January 5, 2021, to file its reply papers.

Having met and conferred with Defendant, Plaintiff respectfully requests one additional week to file its amended complaint in this action, and that parties have agreed to adjust the briefing schedule accordingly and to avoid inconvenience during the upcoming holidays. Accordingly, Plaintiff respectfully requests that the deadlines be extended as follows:

Deadline for Plaintiff’s Amended Complaint – October 30, 2020
Deadline for Defendant to Move or Answer – December 4, 2020
Deadline for Plaintiff to Respond if Defendant Moves – December 30, 2020
Deadline for Defendant to Reply – January 8, 2021

This is the first request for an extension of the aforementioned deadlines by Plaintiff.

Respectfully submitted,

 /s/
Jeffrey B. Korn

cc: All counsel of record (by ECF)